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1 **3. Discovery remaining.** Additional written discovery may be made, and
2 depositions of fact witnesses and expert witnesses will be taken.

3 **4. Reasons for extension.** The parties request this extension to allow time to
4 complete the depositions of necessary fact witnesses prior to the expert disclosure deadlines.
5 Counsel for Plaintiff advises that he spends a portion of each year in the Philippines and that he
6 will not return from the Philippines until August. The parties have been coordinating dates to
7 conduct his deposition upon his return.

8 **5. Revised discovery schedule.** The parties stipulate and agree to a **45-day**
9 extension of the discovery deadline. The parties agree to the following revisions to the
10 discovery plan and ask that the Court adopt it as the revised scheduling order in this case.

11 **A. Discovery Cutoff Date:** The parties agree and respectfully request that
12 the discovery cutoff date be extended from **September 24, 2018** to **November 8, 2018**.

13 **B. Expert Disclosures:** The parties agree and respectfully request that the
14 Court approve an extension of the **July 26, 2018** expert disclosure deadline to **September 10*, 2018¹**.
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16 **C. Rebuttal Experts:** The parties agree and respectfully request that the
17 Court approve an extension of the **August 27, 2018** rebuttal expert disclosure deadline to
18 **October 11, 2018**.

19 **D. Interim Status Report:** The parties request that the Court extend the
20 **July 26, 2018** deadline to file an interim status report to **September 10*, 2018**, which is 60
21 days prior to the proposed discovery cutoff date.

22 **E. Dispositive Motions:** The parties request that the Court extend the
23 **October 24, 2018** deadline to file dispositive motions, if any, to **December 10*, 2018**, which is
24 30 days after the proposed discovery cutoff.

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¹ *Pursuant to Fed. R. Civ. P. 6(a)(C) deadlines falling on a weekend or legal holiday “run until the . . . next day that is not a Saturday, Sunday, or legal holiday.”

1 **F. Pretrial Order:** The parties request that the Court extend the **November**
2 **23, 2018** deadline to file the Pretrial Order to **January 9, 2019**, which is 30 days after the
3 deadline for filing dispositive motions. However, if any dispositive motions are filed, then the
4 Pretrial Order shall be due 30 days after decisions on such motion(s). Disclosures under Fed. R.
5 Civ. P. 26(a)(3) and any objections thereto shall be included in the Joint Pretrial Order.

6 Respectfully submitted this 5th day of July 2018.

7 SOLOW LAW GROUP, PLLC

DAYLE ELIESON
United States Attorney

8
9 /s/ Rachel Solow
RACHEL SOLOW, ESQ.
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11 *Attorney for Plaintiff*

/s/ Lindsay M. Roberts
LINDSY M. ROBERTS
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Attorneys for the United States

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16 **IT IS SO ORDERED:**

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19 UNITED STATES MAGISTRATE JUDGE

20 **DATED:** 7/6/2018
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